

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.202(b))	MB Docket No. 05-243
Table of Allotments)	RM - 11363
FM Broadcast Stations)	RM - 11364
(Meeteetse, Wyoming))	RM - 11365

FILED/ACCEPTED

JUN 28 2007

To: Office of the Secretary
 Attn: Assistant Chief, Audio Division
 Media Bureau

Federal Communications Commission
 Office of the Secretary

**MOTION TO ACCEPT "REPLY TO OPPOSITION TO
 ORDER TO SHOW CAUSE"**

Sand Hill Media Corporation and Sandhill Media Group, LLC (together, the "Joint Parties"), hereby move for acceptance of their contemporaneously filed Reply. Brigham Young University – Idaho ("Brigham Young") filed an "Opposition to Order to Show Cause" in the above captioned proceeding that raised a number of new issues that warrant a response in order for the Commission to base its decision on a complete record. More specifically, Brigham Young argues that Station KBYI(FM) should not be forced to change channels because there are alternate channels available at Lima, Montana, that would obviate the need to change KBYI's channel. This is a new argument and the Joint Parties should be able to respond especially considering that there are overriding public interest reasons for substituting KBYI's channel as specified in the Joint Parties Counterproposal filed in this proceeding.

The Commission may accept this pleading as a matter within its discretion. See 47 C.F.R. 1.415(d); *Lake City, Chattanooga, Harrogate, and Halls Crossroads, Tennessee*, 20 FCC Rcd 18961, note 3 (2005); *Winslow, Camp Verde, Mayer and Sun City West, Arizona*, 16 FCC

Rcd 9551, note 2 (2001); *Nogales, Vail and Patagonia, Arizona*, 16 FCC Rcd 20515 n.5 (2001).

Therefore, the Joint Parties respectfully request the acceptance and consideration of their Reply.

Respectfully submitted,

SAND HILL MEDIA CORPORATION

SANDHILL MEDIA GROUP, LLC

By:


Mark N. Lipp

Scott Woodworth

Wiley Rein LLP

1776 K Street NW

Washington, DC 20006

202-719-7503

Their Counsel

June 28, 2007

CERTIFICATE OF SERVICE

I, Elbert Ortiz, in the law firm of Wiley Rein LLP, do hereby certify that I have on this 28th day of June, 2007, unless otherwise noted, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Motion**" to the following:

*Rolanda F. Smith
Federal Communications Commission
445 12th Street, SW
Room 2-B422
Washington, DC 20554

Patricia M. Chuh
Wilkinson Barker Knauer, LLP
2300 N Street, NW
Suite 700
Washington, DC 20037
(*Counsel to Brigham Young University – Idaho*)

Sun Valley Radio, Inc.
P.O. Box 267
Logan, UT 84323

Citadel Broadcasting Company
City Center West, Suite 400
7201 West Lake Mead Blvd.
Las Vegas, NV 89128

Rocky Mountain Radio Network, Inc.
P.O. Box 190
Evanston, WY 82931

Evans Broadcasting, Inc.
Rt. 2, P.O. Box 2384
Roosevelt, UT 84066

Marissa Repp
Hogan & Hartson LLP
555 13th Street, NW
Suite 1300
Washington, DC 20004
(*Counsel to Citicasters Licenses, L.P.*)

Ashley Communications, Inc.
575 West Main Street
Vernal, UT 84078

Eagle Rock Broadcasting Co., Inc.
3219 Laurelwood Drive
Twin Falls, ID 83301

Tri-State Media Corporation
PO Box 1450
St. George, UT 84771

Skywest Media LLC
PO Box 36148
Tucson, AZ 85740

Eastern Utah Broadcasting Company
PO Box 875
Price, UT 84501

Idaho Wireless Corporation
PO Box 97
Pocatello, ID 83204

David Oxenford
Davis Wright Tremaine LLP
1919 Pennsylvania Ave, NW
Suite 200
Washington, DC 20006



Elbert Ortiz

* HAND DELIVERED